

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON, TEXAS**

UNITED STATES OF AMERICA

vs.

MARY MOSLEY, ET AL.

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CRIMINAL NO. 4:17-cr-00284

MOTION FOR CONTINUANCE AND REQUEST FOR A NEW SCHEDULING ORDER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Mary Mosley, Defendant, by and through his attorney, Wilvin J. Carter, files this Motion to Continue, saying for cause as follows:

1. STATUS CONFERENCE is currently scheduled for **MAY 21, 2018 at 9:00 a.m.**
2. Counsel for Defendant advises that he was officially retained by Defendant as her counsel for the above-mentioned cause number on May 9, 2018.
3. Counsel for Defendant received the Defendant's file from her former attorney on or about February 13, 2018, and I advised Defendant that I would not be officially hired until she paid the full retainer fee. Defendant agreed.
4. Although Counsel for Defendant was not officially retained until May 9, 2018, Counsel began reviewing the in April to acquaint himself with the facts and law surrounding this matter.
5. Consequently, Counsel for Defendant soon realized that this matter was indicted on May 10, 2017, and there are massive amounts of discovery that needs to be reviewed; there are witnesses that need to be located and spoken to; and there may be the need to hire experts to discuss various legal issues in preparation for trial.

6. As a result, Counsel for Defendant is respectfully requesting a continuance and a new scheduling order to direct the course of this litigation.
7. Said Motion for Continuance is not sought for delay, but to ensure that due process is achieved.
8. Counsel for the Defendant has been unable to confer with Assistant United States Attorney, Jill Stotts, and the Government's position to this Motion is unknown at this time.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully prays that this Honorable Court grant this motion and extend the motions and trial dates for one hundred twenty (120) days.

Respectfully submitted,

THE LAW OFFICES OF WILVIN J. CARTER P.C.
7324 Southwest Freeway
Tower 2, Suite 985
Houston, Texas 77074
Telephone 713.454.9890

By: /s/ Wilvin J. Carter
Wilvin J. Carter
State Bar No. 24045622
Attorney for Mary Mosley

CERTIFICATE OF CONFERENCE

I certify that I have not had the opportunity to confer with Assistant United States Attorney Jill Stotts, and the Government's position to this Motion is unknown at this time.

/s/ Wilvin J. Carter
Wilvin J. Carter

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all filing users.

/s/ *Wilvin J. Carter*

Wilvin J. Carter